

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

filed
11/14/2005
(UBR)

United States of America)	
)	MAGISTRATE
vs)	Docket No. 05-1401-CBS
)	
Lowell T. Manning, Defendant)	

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

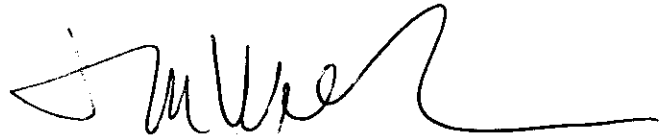
The defendant respectfully requests that the Court ask the following questions of each potential juror in the above captioned matter:

- (1) Have you or anyone among your family or friends ever been involved in an accident with somebody who was thought to be driving under the influence of alcohol?
- (2) If so, would this affect your ability to be impartial in the pending case?
- (3) Would it be embarrassing to you or your family if you sat on a jury in this case and the jury found a person charged with driving under the influence to be not guilty?
- (4) Are you as willing to consider a person charged with driving under the influence of alcohol to be innocent unless and until proven guilty, beyond a reasonable doubt, as you would be with persons charged with other crimes?
- (5) Some of the witnesses in this case are military police officers. In light of this fact, if one of these police officers were to say a certain thing happened or offered a certain description or analysis of facts or circumstances, and another witness who was not a police officer testified that the event happened differently or that the facts or circumstances were different, would you tend to believe the police officer, rather than the other witness, simply because he was a police officer?

(6) Do you or any member of your family belong to any organizations whose purpose is to lobby for stronger drunk driving laws, such as Mothers Against Drunk Driving?

(7) Are you or any member of you family a member of Alcoholics Anonymous, Alanon, or any similar group? If so, would this affect your ability to be impartial in the pending case?

(8) Do you think it is wrong to consume alcohol in any amount, no matter how small, and then operate a motor vehicle? If so, would this affect your ability to be impartial in the pending case?



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Certificate of Service

This will certify that I served a copy of the within pleading on the United States Attorney's Office by faxing a copy hereof, on November 10, 2005, to A.U.S.A. Corey Cappelloni, at 781-377-3279.



Richard M. Welsh